REMARKS

I. Status

In the Office Action mailed October 31, 2005, the Examiner noted that claims 29-49 were pending, withdrew from consideration claims 29-33 and

5 44-49 and rejected claims 34-43. Thus, in view of the foregoing, claims 34-43 remain pending for reconsideration, which is requested. The applicant respectfully traverses the rejection.

II. Rejection of claims under 35 U.S.C. § 102

10 Claims 34-43 are rejected under 35 U.S.C. §102(b) as being anticipated by to Llaguno et al. (US Patent No. 5,729,741). The applicants respectfully traverse the rejections.

Claim 34 identifies "content characteristics of a file" (claim 34, line 3), converts spoken words to data descriptive of file content" (claim 34, line 5),

15 stores said "content characteristics and said descriptive data" (claim 34, line 6) and retrieves "said content characteristics or said descriptive data" (Claim 34, lines 8-9). Claim 40 comprises a "semantic processing engine" which extracts "keywords associated with a text file", a "speech recognition engine" which converts "spoken words describing content" into "descriptive data",

20 and "a data structure" stored with the text file and comprising "keywords" and "descriptive data" used to identify the text.

Llaguno et al. does not disclose "converting spoken words describing content in said text file into file descriptive data" (claim 34) nor "speech recognition engine" which converts "spoken words describing content" into

25 "descriptive data" (claim 40). To support this proposition, the Examiner cites to column 9, lines 42-64, column 12, lines 45-67, and column 13, lines 1-13 of Llaguno et al. However, column 9, lines 42-64 of Llaguno et al. discloses converting an image, at least a portion of which contains text, into a text file. In contrast to Llaguno et al., the present invention processes an image by

30 identifying objects and edges, and from these objects determining keyword attributes to associate with the image. Additionally, the present invention extracts key attributes from a voice narrative and combines this information into metadata. (See specification page 10, line 9 - page 11, line 2). Column

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12, lines 45-64, column 13, lines 1-13, and FIG. 4 of Llaguno et al. discloses a correlation operation through which the contents of a transcribed text file and the contents of a voice-text file are correlated. Figure 2, element 213 discloses a text file and does not disclose "descriptive data" as recited in the

5   invention. The hash code of FIG. 6 is an efficient storage scheme for storing text, but is not "descriptive data" as, for example, described in FIG. 4 of the specification. Thus, Llaguno et al. which discloses a method of converting image and voice files to text and storing the text files efficiently, does not disclose the present invention which identifies "content characteristics of a

10   file" (claim 34, line 3), converts spoken words to data descriptive of file content" (claim 34, line 5), stores said "content characteristics and said descriptive data" (claim 34, line 6) and retrieves "said content characteristics or said descriptive data" (Claim 34, lines 8-9) nor does Llaguno et al. disclose "a speech recognition engine converting spoken words describing

15   content..." into "file descriptive data" as recited in claim 40.

With respect to claim 38, the Examiner cites to Fig 3, column 11, lines 9-56 of Llaguno et al. for the proposition "metadata comprising said content characteristics and descriptive data of each said file" (claim 38). However, this section of Llaguno et al. describes no more than deriving keywords from

20   a text file" (column 9, lines 26-30). Additionally, Llaguno et al. only operates on "text-containing media image files" (column 11, line 43); in contrast with the present invention that can have images without any text.

In summary, all the elements of claims 34-43 have not been disclosed as required under 35 U.S.C. 102.

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III. Dependent Claims

The dependent claims depend from the above-discussed independent claims and are patentable over the prior art for the reasons discussed above. The dependent claims also recite features not taught or suggested by the

30   prior art. For example, claim 38 recites "metadata comprising "content characteristics and descriptive data of each [said] file". Nothing in the prior art teaches or suggests such a feature. The other dependent claims also

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recite additional distinguishing features. It is submitted that the dependent claims are independently patentable over the prior art.

IV. Conclusion

5   Claims 34-43 are believed to be in condition for allowance. Applicants respectfully requests reconsideration and prompt issuance of the present application. Should any issue remain that prevents immediate issuance of the application, the Examiner is encouraged to contact the undersigned attorney to discuss the unresolved issue.

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Respectfully submitted,

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